

1 P. Woodfork - 6/21/19

2 Mischaracterizes testimony.

3 A. I would say that the number is the
4 number of how many -- the percentage of diverse
5 umpires we had at the time, and that the goal
6 was to increase that number.

7 Q. In 2013, were you satisfied that the
8 amount of umpires of color were only 7 percent?

9 A. I think we needed to, again, looking
10 at the number, we needed to increase that
11 number.

12 Q. Does that mean that you were not
13 satisfied?

14 A. It's not satisfaction -- for me,
15 that's not how I -- I'm more analytic. I look
16 at that number, it's not, for me it was not high
17 enough and it's something we need to improve on.

18 Q. Between 2013 and the present, has
19 that number gone up or down?

20 A. Percentagewise, I would have to look
21 at it. I don't know off the top of my head what
22 the percentage is. I think between -- think the
23 number, total number has increased.

24 Q. 15071, while the total number of
25 minority umpires has increased, so has the

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Q. Has MLB since 2012 done anything to
eliminate that bias?

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2 A. I think we've -- we don't hire. MLB
3 doesn't hire the Minor League umpires, so we
4 just watch to see where umpires are coming, from
5 which schools they're coming from and it seems
6 to be a balance.

7 Q. So the answer is nothing, correct?

8 MR. LUPION: Objection, objection,
9 mischaracterizes testimony.

10 BY MR. MURPHY:

11 A. Again, we haven't seen a bias on
12 selecting your own umpires.

13 Q. So --

14 A. I'm sorry, that attended -- that
15 attended your school.

16 Q. So Freedman is wrong in this bullet
17 point?

18 MR. LUPION: Objection.

19 A. Again, that is how he listed it, and
20 again, from 2012, or 2011, we haven't seen that.

21 Q. 15072, the first bullet point, I
22 understand PUBC is now called Minor League
23 Baseball, right?

24 A. I don't know the acronym, but it's
25 something like Minor League Baseball

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2 **Development, maybe.**

3 Q. Right.

4 **A. You can call it either one.**

5 Q. O.K.

6 Is the first bullet point true that
7 "PUBC," or Minor League Baseball, and like you
8 said, for these questions I'm just going to say
9 PUBC --

10 **A. That's fine.**

11 Q. -- "is responsible for the
12 development and evaluation of the Minor League
13 umpires."

14 Is that still true?

15 **A. From rookie ball through AA.**

16 Q. Right.

17 **A. As far as I know.**

18 Q. So Major League Baseball only gets
19 involved with Minor League umpires at the AAA
20 level, correct?

21 **A. In development and evaluation, Minor**
22 **League umpires.**

23 Q. AAA.

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2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 Q. The salaries that Minor League
8 umpires and rookie -- is there low A and high A?

9 A. There is low A and high A.

10 Q. O.K.

11 A. And rookie and rookie advanced.

12 Q. Right, rookie, rookie advanced, low
13 A, high A, AA, does Major League Baseball
14 subsidize their salary during the regular season
15 in the Minor Leagues?

16 A. We do not subsidize their salaries
17 in the regular season.

18 Q. I'm sorry?

19 A. Major League Baseball does not
20 subsidize their salary in the regular season.

21 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 **P. Woodfork - 6/21/19**

2 **don't know off the top of my head where he was**
3 **on special events experience.**

4 Q. How about overall quality of
5 performance on the field, would you say he's
6 above average?

7 **A. During what time?**

8 Q. Between 2011 and 2016.

9 **A. I think his performance on the field**
10 **at times can be above average and I think it can**
11 **be below average at times as well.**

12 Q. But you know what the concept of an
13 average is, right? Is he above average during
14 those years on these quality performance with
15 the plate and on the base path?

16 MR. LUPION: Objection. Asked and
17 answered.

18 **A. You have to be more specific in the**
19 **year and time of his performance.**

20 Q. Are you familiar with Angel's
21 performance as it relates to year by year?

22 **A. As much as I am the seven six, I**
23 **would need to look at his reviews --**

24 Q. Right.

25 **A. -- and, again, for a specific year.**

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2 Q. Next to last bullet point on the
3 right, "Seniority is awarded with a few younger
4 umpires each year often given an opportunity so
5 that they can gain experience."

6 This was 2013, is that true still
7 today?

8 MR. LUPION: Object to the form.

9 **A. I think this is an argument we were**
10 **having in 2013, over expected -- over evaluation**
11 **of seniority, especially trying to get younger**
12 **and more objective -- more objective in our**
13 **criteria from 2013 to 2014, I think or from 2011**
14 **I think when this was done; 2014, we were able**
15 **to become more objective.**

16 Q. And that decision would hurt Angel
17 Hernandez, Alfonso Marquez, and Kerwin Danley in
18 particular, would you agree?

19 MR. LUPION: Objection.

20 **A. I would say that in coming off of**
21 **straight seniority or heavily influenced**
22 **seniority decision would affect people with more**
23 **seniority.**

24 Q. Even then in 2013, go to the next
25 page, those three were more senior than Danley

1 P. Woodfork - 6/21/19
2 and Barrett -- I mean, Danley and Hernandez had
3 more experience than Barrett and Culbreth,
4 correct?

5 **A. I don't know their service off the**
6 **top of my head, but I take your word for it.**

7 Q. And this switch to go away from
8 seniority has certainly affected white umpires
9 far less than the minority umpires, would you
10 agree?

11 MR. LUPION: Objection.

12 **A. I would say the thought of seniority**
13 **being the driving force and the lone force of**
14 **decision-making has impacted people with more**
15 **seniority regardless of race.**

16 Q. You would agree that you have passed
17 over Danley, Marquez and Angel Hernandez, for
18 crew chief when they have had more years than
19 many of the white umpires that you've selected
20 since you've been there?

21 MR. LUPION: Object to the form.

22 **A. I would say that we, again, we**
23 **believe that we selected the umpires that we**
24 **feel are best -- that are going to perform the**
25 **best in the crew chief position. And some of**

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2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 Q. All right, let's go to 15092.

9 "Supervisors and field observers
10 regularly evaluate umpire performance through
11 games in-person."

12 In 2011 when you started, the
13 percentage was 60.2 percent, in 2012 was 57
14 percent.

15 Can one take from those percentages
16 that the Office of the Commissioner felt it
17 important enough that umpires get reviewed by
18 in-person supervisors and observers?

19 MR. LUPION: Object to the form.

20 **A. I'm sorry, I didn't understand that**
21 **question.**

22 Q. The amount of games in 2011 and
23 2012, and throughout this whole graph, 2008
24 through 2012, they're there over half the time.

25 Does that reflect that Major League

1 P. Woodfork - 6/21/19
2 Baseball thought that it's important to evaluate
3 an umpire with someone at the field watching
4 them work in-person?

5 A. I think, you know, again, during
6 this time period, observations and supervisor
7 presence is important for evaluation as well as
8 the supervisors' communication with the umpires.

9 Q. But in spite of all of these
10 observed games with supervisors and field
11 observers presenting written reports for each
12 game, you don't look at them, right?

13 A. In 2011, I spend more time looking
14 at them. As I got, as I said, as I got in in
15 2018, I looked at them much less or I don't look
16 at them at all in 2018, or '19.

17 Q. Would you go to 15098.
18 Are the clubs aware of the buffer
19 zone?

20 A. Yes.

21 Q. Of the players?

22 A. I can't specifically answer. I
23 don't know if they're aware. The clubs have
24 been communicated with.

25 Q. Does Major League Baseball tell the

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2 media about this buffer zone?

3 **A. I can't answer for all of Major**
4 **League Baseball, but when asked about it, I have**
5 **spoken that there's a buffer zone.**

6 Q. Did you read the report from that
7 Boston professor a couple of months ago?

8 **A. I did.**

9 Q. And do you know where he got his
10 information from?

11 **A. I do not.**

12 Q. Did he say he got the information
13 from --

14 **A. Excuse me, I don't recall.**

15 Q. Do you remember that he got the
16 information from information provided by Major
17 League Baseball?

18 **A. I don't recall, but I know that the**
19 **raw data is put there.**

20 Q. All right.

21 Did, I'm sorry, what was the
22 reaction of Major League Baseball to that
23 professor's report?

24 MR. LUPION: Object to the form.

25 **A. I mean, I don't recall what Major**

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2 League Baseball. You know, my reaction to it
3 was that there were liberties taken in it and it
4 didn't include obviously, our -- the adjustments
5 that are made for umpires.

6 Q. And the reason why is because that's
7 not public, correct, the adjustments are not
8 made public --

9 A. No.

10 Q. -- am I right?

11 A. The ZE scores are not made public.

12 Q. 15102. I already asked the question
13 about plate judgment and base judgment as
14 related to the crew chiefs that you've selected
15 since 2011.

16 Would you agree that Angel Hernandez
17 submits timely umpire reports to the Office?

18 A. I don't recall.

19 Q. Would you agree that he stays in
20 communication with the Office when he's supposed
21 to?

22 A. As far as I know, during the time
23 period that I can recall, yes.

24 Q. Well, from 2011 to 2016, how's that?
25 Do you know of any problems that he had with

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2 communications with the Office?

3 **A. I don't recall.**

4 Q. Are you aware of what his
5 supervisors have said to him repeatedly about
6 Pace of Game Procedures?

7 **A. I don't recall.**

8 Q. What does Field Proficiency mean?

9 **A. MLB Field Judgment.**

10 Q. Wouldn't that be how they move on
11 the field?

12 **A. Oh, sorry, eight items on there,**
13 **that could be -- I'd have to read the exactly**
14 **field proficiency effect; confused it with base**
15 **judgment, I thought that what they were**
16 **referring to up there.**

17 Q. Would you agree that Angel Hernandez
18 is one of the most physically fit umpires that
19 you have on staff?

20 MR. LUPION: Object to the form.

21 **A. I would have to look.**

22 Q. But that's something that umpires
23 are reviewed by Major League Baseball, correct,
24 they want them to be in good shape?

25 **A. We hope our umpires are in good**

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shape.

Q. All right.

And you've seen on midyear and end-of-year evaluations, with certain umpires, that comments are, stay on your offseason program, you've seen those?

A. I've seen comments regarding staying on your -- remain physically fit to continue with your mobility and other field movements, yes.

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Q. Would you go to 15108.

Who is the one person in the Office of Commissioner -- or let me change the question.

Is there a person or persons at the
Office of the Commissioner whose job it is to

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2 director, Minor League development to push the
3 umpire camps. And I depend a lot on our chief
4 diversity officer previously, and our new one,
5 René Tirado and Wendy Lewis, I try -- and other
6 options. I also spoke to a bunch of leagues,
7 other leagues on how to try to recruit and
8 develop or at least recruit umpire diversity, as
9 well.

10 So I would say that, again, as part
11 of the job responsibility of heavy umpiring
12 department, Joe, myself, you know, as well as
13 depending on or are working with our chief
14 diversity officer.

15 Q. So that would be you and Rich Rieker
16 based upon your answer?

17 MR. LUPION: Object to the form,
18 mischaracterizes the witness' testimony.

19 A. I think everyone has that
20 responsibility in our department. I apologize
21 if I wasn't clear on that, but again from Joe
22 down to myself to Rich Rieker in working with
23 our chief diversity officer.

24 Q. Who was the chief diversity officer?

25 A. René Tirado.

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P. Woodfork - 6/21/19

[REDACTED] [REDACTED]

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11/11/2016

10 of 11

1



1 P. Woodfork - 6/21/19
2 social organizations to shore up pipeline of
3 diversity candidates.

4 What, if anything, has been done
5 with the armed forces besides --

6 MR. LUPION: Object.

7 Q. -- inviting them to the camps?

8 MR. LUPION: Object to the form.

9 The witness can answer.

10 A. That's been our major step with the
11 armed forces, that we have reached out to them,
12 tried to, besides the camps, which how much has
13 been our major focus, others have been, when we
14 play in Ft. Bragg or other places, try to reach
15 out to them for additional candidates to come to
16 umpire school. It has been helpful that
17 Richard, who's son, is in the military and helps
18 promote for us as well. But again, we have not
19 showed -- we show some inroads there but
20 continue to need to put effort in there.

21 Q. Universities?

22 A. I've spoken at universities about
23 umpiring opportunities. We've also tried to
24 reach out when players are released as an
25 opportunity today through our continuing

1 P. Woodfork - 6/21/19
2 educational for players that umpiring is an
3 opportunity for them as well as going back to
4 school or doing that.

5 I've spoken at Howard and other
6 universities to try to speak about diversity and
7 umpiring as an option for candidates.

8 Q. How about social organizations?

9 A. I can't give you, to my knowledge or
10 my recollection, what we've done with social
11 organizations.

12 Q. Has Major League Baseball created a
13 marketing campaign to promote the umpires?

14 A. Not to my knowledge.

15 Q. Have they created a marketing
16 campaign to promote the umpiring program?

17 A. Marketing and promotion of our
18 umpire camps to try to promote our umpiring
19 program.

20 Q. Those are one day camps, right?

21 A. They're five one-day camps and then
22 the finishing school.

23 I apologize, during what time
24 period, Kevin?

25 Q. How about now?

1 P. Woodfork - 6/21/19

2 **A. That's speaking to now.**

3 Q. That's what I thought you said.

4 If you would take a look real
5 quickly at 15075.

6 MS. PHILION: What number?

7 **A. 15075?**

8 MR. LUPION: Going backwards.

9 BY MR. MURPHY:

10 Q. This just relates to something he
11 said.

12 "Barely one-third of MLB umpires
13 have graduated from a four-year college," is
14 that seen as a negative?

15 **A. I don't see it as a negative. I**
16 **think it's a life experience that can be an add**
17 **to your experience, it can be a positive, but I**
18 **don't think it's a negative. Obviously you**
19 **don't have to go to a four-year college to be an**
20 **umpire.**

21 Q. 15141, has this been implemented,
22 "Post season and special event assignments,
23 along with the" Association -- I'm sorry, "along
24 with the associated compensation should be given
25 to the highest performing umpire."

1 P. Woodfork - 6/21/19

2 Has Major League Baseball done that
3 since 2013?

4 **A. I think we've strived since 2011 to**
5 **put the highest performing umpires overall in to**
6 **the post season.**

7 Q. 15146.

8 "Given the long-term nature of
9 umpire development, the only way to approach
10 MLB's diversity issue is through lower level
11 recruitment of minorities."

12 Besides the camps and the finishing
13 school once they leave there, they are subject
14 to the decisions made by Minor League Baseball,
15 whether they get advance or whether they go
16 home, correct?

17 MR. LUPION: Object to the form, you
18 can answer.

19 **A. Up until AA, their evaluation**
20 **development is up to the Minor League.**

21 Q. Up until AAA, right?

22 **A. Excuse me, through AA.**

23 Q. Through AA?

24 **A. Sorry.**

25 Q. Correct.

1 P. Woodfork - 6/21/19

2 So, if Major League Baseball gets
3 the overwhelming white umpires coming into AAA,
4 there's just nothing they can do about it,
5 right?

6 A. No, again, the -- Minor Baseball
7 hires the umpires, as we discussed, through the
8 umpire schools. I think we try to promote a
9 diverse group through our programming, through
10 our programs, as well as through our partnership
11 with, not only just underrepresented groups, but
12 also women, our partnership with Baseball for
13 All to try to get them candidates to come. The
14 ones we select are from who Minor Baseball has
15 hired.

16 Once we're done with this document,
17 I would like to take a quick break to run to the
18 bathroom, but I don't want -- no one else has to
19 leave.

20 Q. Do you know what the percentage of
21 African American umpires are in AAA?

22 A. Not off the top of my head, no.

23 Q. Do you know what the percentage of
24 Hispanic umpires are in AAA at this time?

25 A. Not off the top of my head.

1 P. Woodfork - 6/21/19

2 I think we were just giving a heads
3 -- giving him a heads-up on who was named the
4 crew chiefs in the 2017 season.

5 Q. But he said, "Good by me," does that
6 mean he approved them?

7 A. I don't know what he meant by that,
8 but it looked like we already named them.

9 Q. Well, you already named -- well,
10 yup, yup, yup, yup.

11 A. I'm utterly shocked on the record
12 that I sent it to the supervisors before I sent
13 it to the Commissioner.

14 (Plaintiff's Exhibit 149, email from
15 McKendry to Woodfork, Wagner, dated
16 1/3/2018, Bates stamped DEF 8050 through
17 8067, marked for identification, as of
18 this date.)

19 BY MR. MURPHY:

20 Q. O.K., 149.

21 This is an email, Matt McKendry to
22 you, copy to Raquel, subject 2018 Potential Crew
23 Chiefs, attachments, 2018 Crew Chief Potential
24 Hires.

25 "Please See the attached deck

1 P. Woodfork - 6/21/19
2 containing information regarding the potential
3 crew chief hires for 2018, the candidates and
4 their total number of games worked as a crew
5 chief are as follows:" Then it lists it. And
6 then you will you'll see the potential crew
7 chief for 2018, and you'll see these sheets.

8 We did not receive anything like
9 this before 2018, is this something that was put
10 into effect that was new?

11 MR. LUPION: Object to the form.

12 **A. I don't recall what we put together**
13 **previously for our documents on crew chief.**

14 Q. Do you recall whether anything like
15 this with the picture of the umpire and the
16 career information and the crew chief games
17 worked exceeds DNM votes, have you ever seen
18 anything like this comparison prior to 2018 in
19 this form?

20 **A. For crew chiefs?**

21 Q. Yes.

22 **A. Not that I recall.**

23 Q. On this list of candidates, Angel
24 Hernandez had the most crew chief games,
25 correct?

1 P. Woodfork - 6/21/19

2 **A. Correct.**

3 Q. And the selection in 2018 for crew
4 chief was which umpire?

5 **A. 2018, if I recall correctly, was**
6 **Mark Wegner.**

7 Q. Right.

8 Did you review this packet of
9 information before you gave your recommendation
10 to Mr. Torre?

11 MR. LUPION: Object to the form.

12 **A. I don't believe so.**

13 MR. MURPHY: I think the objection
14 was that I may have presumed that you did
15 give your recommendation to Mr. Torre, is
16 that the nature of it?

17 MR. LUPION: No, actually, well
18 that's one basis for the objection.

19 The objection also is it assumed
20 that he reviewed that document in
21 connection with formulating his
22 recommendation.

23 MR. MURPHY: I think that was my
24 question, I think that was my question.

25 BY MR. MURPHY:

1 **P. Woodfork - 6/21/19**

2 Q. All right.

3 In these years, in these selections,
4 2013, Barrett, Culbreth, Joyce; 2014, Nelson
5 Miller; 2015, Vanover, Meals; 2017, Emmel,
6 Everitt, Holbrook, in any of those years, did
7 you ever recommend to Joe Torre a minority
8 candidate for crew chief?

9 MR. LUPION: Object to the form.

10 You can answer.

11 **A. I think we discussed this before, I**
12 **don't recall recommending.**

13 Q. It's a positive thing for an umpire
14 to get an exceeds from a supervisor or observer,
15 would you agree?

16 **A. It's positive for them to get an**
17 **exceeds from supervisor, observer, director.**

18 Q. The process of preparing the midyear
19 and the year-end, the last couple of years, how
20 often do you edit umpires' midyear and year-end
21 evaluations?

22 MR. LUPION: Object to the form.

23 **A. It would be -- what do you mean by**
24 **how much?**

25 Q. Here is what I would like to know.

1 P. Woodfork - 6/21/19

2 I know the form for the midyear and
3 the end of the year because I showed it to you
4 at the beginning.

5 **A. Yes.**

6 Q. You know, at least a couple of weeks
7 before the midyear, the comment section is
8 blank.

9 Who is the first one to write on the
10 computer the comments that then get shared with
11 the others?

12 MR. LUPION: Object to the form. If
13 you understand the question, you can
14 answer.

15 **A. I was going to ask a question, but**
16 **to be specific, who opens up the document first**
17 **or who opens up the process?**

18 Q. Yes, who starts the process of
19 putting content in those comment boxes.

20 **A. It depends -- I would say it depends**
21 **on the box, what -- what area of the review**
22 **we're discussing.**

23 Q. Do the supervisors have a right to
24 put their input in those boxes?

25 MR. LUPION: Object to the form.

1 P. Woodfork - 6/21/19

2 A. Supervisors add context to certain
3 areas, certain areas of the review, they've
4 added to.

5 Q. O.K., teach me the process.

6 A. So this may take a little while.

7 Q. Who first -- maybe I?

8 A. Actually I've got to walk it
9 through.

10 Q. Maybe I can narrow it down.

11 Who first provides content?

12 A. I think the review process is opened
13 up, again, it depends on which category we're
14 talking about. We're talking about the year-end
15 review, obviously, there's a lot of boxes. It
16 opens up to the umpire supervisor first. He may
17 add examples on a form, some may try to write
18 sentences for certain areas of it. Other
19 people, Matt McKendry, Raquel Wagner, might add
20 the objective information to the ZE area.

21 The objective information of replay,
22 someone from replay may add the paragraph from
23 replay or send in the paragraph from replay that
24 needs to be added.

25 The administrative might come from,

1 P. Woodfork - 6/21/19

2 the information might come from the sources
3 added by Matt, maybe Raquel. It's really --
4 it's a live document as it moves through the
5 process.

6 And then, by the time, you know, it
7 gets to myself, it's usually been cleaned up,
8 making editorial, making sure there's
9 consistency in the one thing that is difficult
10 for the entire group is the consistency across
11 the board, that all 76 we're trying to treat and
12 grade equally and fairly among themselves.

13 So I think those are all steps when
14 it comes to me. So, I may have questions, for
15 Matt, for a supervisor, how he landed somewhere,
16 the confirmation that everything that's in those
17 reviews should have been spoken about to the
18 umpire. Again, that's the goal. I know getting
19 feedback from umpires, that's not always the
20 case, but I get a lot of verbal communication
21 with umpires is important because, as you
22 mentioned before, they're being seen by a number
23 of different people, but that conference call,
24 those discussions are one and that supervisor's
25 responsibility is to keep his umpire up-to-date

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2 on, both, positive and negative.

3 And then that document comes from
4 myself, edit it, make sure for consistency and
5 grading and then I provide copies, I'll take
6 this year if it's easier, this year?

7 Q. Yes.

8 A. I provide -- sorry?

9 Q. I was confused at something, and if
10 you keep going, I might forget.

11 You add content?

12 A. I might forget where I was.

13 MR. LUPION: I'll remind you.

14 BY MR. MURPHY:

15 Q. You add content by your edits, am I
16 right?

17 A. I would say I try not to, again, if
18 I'm adding content or most part, I'm editing.
19 If it's added content, it's something that I
20 feel we've missed. I talk to the supervisor,
21 did we miss something or do that, but for the
22 most part, I spend more time editing it to make
23 sure it's just consistent and logical than I do
24 editing the content.

25 Q. Is Mr. Torre --

1 P. Woodfork - 6/21/19

2 A. I'll get to the last couple of steps
3 and then that may answer some of your questions.

4 Q. O.K., very good.

5 A. And then as it gets to that version
6 we'll send out to Joe as well as Randy Marsh, an
7 overall review as Randy is our director Major
8 League Umpiring operations, and he'll take a
9 look at all 76, to make sure that we're, you
10 know -- again, that we haven't missed anything
11 and Joe will take a look as well.

12 Q. And Randy and Joe may edit.

13 A. They'll usually -- call discuss, if
14 they have an edit, myself, or Matt may add that
15 edit physically, especially, the year-end kind
16 of, you know, bumps up to Christmas and not
17 everyone is in the office?

18 Q. So this form is on the Halogen
19 system?

20 A. This form is on the Halogen system.

21 Q. And is there any way to determine
22 the various edits and who made them on that
23 system?

24 A. Not to my knowledge.

25 Q. So if something is written by a

1 P. Woodfork - 6/21/19
2 supervisor, and it gets edited with some
3 changes, it's basically overwritten?

4 MR. LUPION: Object to the form.

5 A. I think if there is -- I should
6 apologize, the supervisor then gets copies of
7 the reviews as well when they're done. Discuss
8 with him, I think if there's any content, large
9 content changes, it's discussed with him
10 previously before; in other words, at that time
11 that we're making them, or we feel a need to
12 edit or add content to discuss with him so he's
13 part of the process throughout.

14 Q. Like you, when I type or I send a
15 text, and I want to change it, that lovely
16 reverse taking stuff out, changing the sentence.

17 My question is: If Eddie Montague
18 says your situation management throughout the
19 year has been very good, hope you continue that
20 during the year, and that gets changed to
21 something like, you need to improve your
22 situation management with managers and players,
23 and you need to improve.

24 Is there any way on the Halogen
25 system to be able to see what the supervisor

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2 actually wrote that was overwritten?

3 MR. LUPION: Objection. Assumes
4 facts.

5 BY MR. MURPHY:

6 A. Again, as I said, you know, who I --
7 not to my knowledge could you view back and see
8 who changed.

9 Q. All right.

10 And is that still true today?

11 A. As far as I know, we're moving away
12 from the Halogen system.

13 Q. And this has been true since 2011
14 correct?

15 MR. LUPION: Objection.

16 Q. The way the system works, the
17 process?

18 A. The system itself, as far as I
19 recall, the system itself has worked the same
20 since 2011.

21 Q. All right.

22 A. The Halogen system.

23 Q. And the system has been the same up
24 to and including 2019?

25 A. The Halogen system?

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2 A. Again, I don't recall in the
3 process, I'm sure I've edited every umpire's,
4 especially in 2011 again, where it was more
5 early on in 2011, 2012, I was actually adding
6 the content on behalf of the supervisors.

7 Q. When you were hired originally by
8 the Office of the Commissioner in the Labor
9 Department, who hired you?

10 MR. LUPION: Objection. Asked and
11 answered.

12 BY MR. MURPHY:

13 Q. Was it Jimmie Lee Solomon?

14 A. No.

15 Q. O.K.

16 A. It was again, Frank Coonelly and
17 John Ricco.

18 Q. Now, earlier, in the testimony I
19 think you said that you considered yourself to
20 be, I don't know how you put it, but a diversity
21 candidate yourself or something to that effect.

22 Do you recall what you said --

23 A. I don't recall saying that.

24 Q. Do you remember going in to the
25 umpire locker room in Arizona and telling Angel